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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No: 4:19-cv-02184-PJH

“AMY,” “ERIKA,” JANE SMITH, as next of
friend for “TORI,” minor, “JENNY,” and
“JESSICA,” “LILY,” “SARAH,” JOHN DOE
as court appointed conservator for “SIERRA,”
and “SALLY,” minors, JANE DOE as court
appointed conservator for “SKYLAR” and
“SAVANNAH,” minors, “MAUREEN,”
WILLIAM L.E DUSSAULT as Guardian ad
Litem for “VIOLET,” minor, JANE ROE, as
next of friend for “PIA,” and “MYA,” minors,

Plaintiffs,

v.

RANDALL STEVEN CURTIS,

Defendant.

DECLARATION OF DEBORAH A. BIANCO
IN SUPPORT OF MOTION FOR APPROVAL
OF MINOR SETTLEMENT RE PIA, A MINOR

HEARING DATE:
TIME: 10:00 am
COURTROOM:

BEFORE HONORABLE LAUREL BEELER
UNITED STATES DISTRICT COURT

DECLARATION OF DEBORAH A. BIANCO IN SUPPORT OF
MOTION FOR APPROVAL OF MINOR SETTLEMENT

1
2 I, DEBORAH A. BIANCO, hereby declare the following:

3 1. I am an attorney licensed to practice law in the states of Washington, Missouri and
4 Illinois, and I make this declaration based on my personal knowledge and belief and I am competent to
5 testify to the facts set forth herein.

6 2. Qualifications. I have been licensed to practice law continuously since 1983. A copy
7 of my Curriculum Vitae is attached hereto as Ex.1. I am currently licensed and in good standing in the
8 states of Washington, Missouri, and Illinois. I have never been disciplined by any Bar Association and
9 there are no matters currently pending with any Bar Association concerning me.
10

11 3. Carol Hepburn and I jointly represent the Plaintiffs Pia, Mya, and Maureen in this
12 matter. We also co-represent approximately 12 other victims of child pornography crimes. Maureen is
13 an adult, and during the pendency of this case Mya has reached majority.
14

15 4. I am primarily responsible for matters involving the Plaintiffs known as the Sweet
16 Sugar victims who are identified by the pseudonyms of Pia and Mya and the Lighthouse1 victim,
17 identified by the pseudonym of Maureen. John Kawai is our local counsel, and has conferred with us
18 prior to and throughout the pendency of this matter. Carol Hepburn, John Kawai, and I have jointly
19 worked on this case, on behalf of all of the Plaintiffs.
20

21 5. Appropriateness of Proposed Settlement. Over the last few years there have been a
22 number of settlements of civil claims negotiated on behalf of both the Sweet Sugar victims and the
23 Lighthouse1 victim, as well as other victims, including some who are Plaintiffs in this case, and
24 others with similar claims but who are not Plaintiffs in this matter. None of these civil claims by
25 victims of child pornography crimes has proceeded to trial.
26
27

28 DECLARATION OF DEBORAH A. BIANCO IN SUPPORT OF
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1 6. During the conduct of this matter and particularly during settlement negotiations, Carol
2 Hepburn and I have kept our clients apprised of the legal issues raised and the progress of the
3 litigation. Important concerns in this matter include the paucity of reported cases on the legal issues
4 raised by the claim or the affirmative defenses, the prospect of collection of any settlement or
5 judgment, and shielding our minor clients from deposition or any direct involvement in this
6 litigation. I have personally communicated with the legal guardian/Next Friend of the Sweet Sugar
7 victims, with Mya who has now reached majority, and with Maureen. All are in favor of this
8 settlement. Mya and Maureen attended the Settlement Conference and approved of the settlement.
9

10 7. In light of these issues, the particular facts of this case, most importantly the lack of
11 assets held by the Defendant Mr. Curtis, and based on my knowledge of settlements of other claims
12 brought on behalf of these Plaintiffs and others similarly situated, we believe that this overall
13 settlement is fair and reasonable for our clients, and is in the best interests of our minor clients,
14 including Pia. Pia's Next Friend and legal guardian also believes that this settlement is in Pia's best
15 interests.
16

17 8. Fees and Costs. This is a contingent fee case in which I do not expect to earn my
18 normal hourly rate of \$450.00. The Plaintiffs' team, as a whole, has expended more than \$400,000 in
19 attorneys' fees working on the case up to the point of settlement. I believe, based on the amount of
20 the settlement, the fees that will be paid to the attorneys in this matter will be considerably less than
21 what we would have earned had we been billing our clients on an hourly basis, but the fees of 1/3 of
22 the total recovery are consistent with our fee agreements with our clients.
23

24 In the two plus years that this case has been pending I have: drafted pleadings, reviewed and
25 edited drafts of pleadings, had numerous phone conferences and email correspondence both with my
26 co-counsel and with opposing counsel, including a series of weekly "Meet and confer" phone
27 DECLARATION OF DEBORAH A. BIANCO IN SUPPORT OF
28 MOTION FOR APPROVAL OF MINOR SETTLEMENT

1 conferences over discovery issues. I have performed legal research, communicated the status of the
2 proceedings to clients, worked on discovery (including drafting responses to interrogatories, and
3 working with clients preparing for depositions and attending depositions of expert witnesses),
4 consulted with witnesses, drafted legal memoranda, participated in several settlement conferences,
5 and attended hearings by Zoom.
6

7 Plaintiffs' counsel have also advanced costs on behalf of their clients in this matter. I have
8 personally incurred costs of \$6,981.10 in this matter, consisting of: \$4,539.66 paid to Kevin Laws in
9 connection with his travel to San Francisco for the identification of the images of the Sweet Sugar
10 and Lighthouse1 victims from Mr. Curtis' child pornography collection and report concerning same;
11 \$1,943.80 paid in connection with deposition preparation of our clients with a consultant expert
12 Denver; round trip travel Seattle to Denver and back again for myself and Carol Hepburn of \$497.64.
13 None of the clients to my knowledge have paid any of the costs in this matter.
14

15 14. I ask the court to approve the minor settlement in this matter and to approve the fees
16 and costs requested overall.
17

18 I hereby declare under penalty of perjury under the laws of the United States of America that
19 the foregoing is true and correct to the best of my knowledge.

20 Respectfully signed and submitted this 16th day of August, 2021 at Bellevue, Washington.

21
22 s/ Deborah A. Bianco

23 By: Deborah A. Bianco, Pro Hac Vice
24 Attorney for Plaintiffs Jane Roe for Pia, Mya, and
25 Maureen
26
27

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MOTION FOR APPROVAL OF MINOR SETTLEMENT

EXHIBIT 1

Deborah A. Bianco

EDUCATION

1980 B.A. Washington University, St. Louis Missouri cum laude

1983 J.D. Washington University, St. Louis, Missouri

LICENSURE

State of Illinois-November 9, 1983; Bar number 06185162

State of Missouri-May 5, 1984; Bar Number 31245

State of Washington-November 13, 1990; Bar Number 19826

EMPLOYMENT

June, 1982- December, 1983

Land of Lincoln Legal Assistance Foundation, St. Clair County Office, 327 Missouri Avenue, East St. Louis, IL 62201; (618) 271-9140,

and

August 1984- November, 1987;

Land of Lincoln Legal Assistance Foundation, Madison County office, 413 East Broadway, Alton, Illinois 62202; (618) 462-0036

I worked for these Legal Services Corporation offices in two *January-May, 1990* different locations, first as a law student in East St, Louis, Illinois, then as a staff attorney, in Alton, Illinois, and later, again, as a staff attorney in East St. Louis, Illinois. My movement between offices was largely a function of LSC budget cuts. In both offices I handled a family law caseload of cases consisting almost exclusively of domestic violence and contested child custody matters, although I also had an opportunity to be involved in class action litigation in the East St. Louis office.

November, 1987- July, 1989 Love, Lacks & Paule, Inc. P.S.,

11 S. Meramec, Seventh Floor, Clayton, Missouri 63105; (314) 863-4100

I was employed as litigation associate, working initially as in-house counsel for the local Coldwell-Banker residential real estate group, but gradually assuming a domestic relations caseload with an emphasis on issues involving children.

October, 1990- July, 1992 Anderson & Fields, Inc. P.S.,

207 East Edgar St., Seattle, WA 98102; (206)322-2060

I worked as an associate attorney handling family law matters and maintaining my own caseload of family law cases, including dissolutions, modifications, juvenile court, pre-nuptial contracts and domestic violence cases.

July, 1992 October, 1995- Reaugh, Fischnaller & Oettinger, Inc. P.S., 2001 Sixth Avenue, Suite 3000, Seattle, WA 98121; (206)448-7600

I worked as a family law attorney, primarily, although during my employment I also had an opportunity to be involved in a legal malpractice action involving a prominent family law attorney, and I also served as co-counsel in a jury trial involving an employment matter.

*October, 1995- December, 2007 Campiche, Hepburn & Bianco, P.L.L.C.
300 Elliott Avenue West, Suite 550, Seattle, WA 98119
(206)281-9000*

I was an owner/unit holder of the firm. My practice consisted primarily of family law matters. The firm was composed of three attorneys with a support staff of five employees.

January, 2007-Present Deborah a. Bianco, P.S., 14535 Bellevue-Redmond Rd.
#201, Bellevue, WA 98007 (425) 747-4500

Since January 1, 2007, I have been self-employed, as a sole proprietor in my own law firm. I represent individual clients in family law matters. I work with a paralegal, Lesley Roberts, who has worked with me for the past 22 years.

LAW RELATED ACTIVITIES

I was a member of the Board of Directors for Legal Services of Eastern Missouri from 1988-89.

I served as a member of the Highline Community College Paralegal Program Advisory Board from 1994-2003 and I was the chair of the board for one year.

I served as a mentor in the King County Bar Association Family Law Mentor Program from 1994-2012.

I received a certificate in mediation from the University of Washington Law School Foundation Professional Mediation Skills Training Certificate Program in 1994, and mediation has been a part of my practice since that time.

I have been a volunteer mediator for the King County Settlement Conference program in both Kent and Seattle, since 1996.

I served as a volunteer attorney in the King County Bar Neighborhood Legal Clinic program from 2007-2015.

I took the University of Washington Parenting Evaluation Training Program and attended Guardian ad Litem training. I served as a guardian ad litem until 1998.

I currently serve as a family law commissioner pro tempore, for King County and have served as a family law court commissioner pro tempore since 1998.

I have written materials and/or been presenter of the following:

Panel member-Sexual and Domestic Violence	April, 1987
Trying A Contested Child Custody Case	April, 1989
Surviving Transitions With the Legal System	April 7, 1989
Family Law Litigation in Washington	1994
Using the Psychology Expert in Custody and Visitation Issues in Washington	September 26, 1996
Family Law in Washington	March 22, 1996
Preparing a Parenting/Custody case	March 25, 1997
WSTLA <i>Trial News</i> "Litigating Under the Hague Convention"	January, 2001
Child Custody and Visitation in Washington	February 22, 2001
Child Custody and Visitation in Washington	April 16, 2002
McKinley Irvin CLE Speaker Series-Domestic Violence	April 8, 2015
King County Bar Association-Navigating the King County Ex Parte Department	December 14, 2016

I am a member of the following Bar Associations:

- Washington State Bar Association (#19826)
- The Missouri Bar (#31245)
- Illinois State Bar Association (#6185162)
- American Bar Association
- King County Bar Association
- Association of Family and Conciliation Courts
- National Crime Victims Bar Association